

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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JONATHAN PAUL CATLIN,

Plaintiff,

ANSWER

-against-

15-CV-6214

LTD FINANCIAL SERVICES, LP,

Defendant.

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Defendant, LTD FINANCIAL SERVICES, LP, by its attorneys, Barron & Newburger, P.C., answers plaintiff's complaint as follows:

1. Defendant acknowledges being sued pursuant to federal law, but denies any violation thereof.

2. Defendant admits the allegations contained in paragraph "2" of the complaint.

3. There is no paragraph "3" in plaintiff's complaint.

4. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "4" of the complaint.

5. Defendant admits the allegations contained in paragraph "5" of the complaint.

6. Defendant admits the allegations contained in paragraph "6" of the complaint.

7. Defendant repeats ad realleges its previous admissions and denials contained in paragraphs "1" through "6" of the complaint.

8. Defendant admits placing telephone calls to plaintiff, but denies that any of the telephone calls were in violation of state or federal law.

9. Defendant denies each and every allegation contained in paragraph "9" of the complaint.

10. Defendant denies each and every allegation contained in paragraph "10" of the complaint.

11. Defendant admits the allegations contained in paragraph "11" of the complaint.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

12. This claim is barred, in whole or in part, by the applicable Statute of Limitations.

WHEREFORE, defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New City, NY

May 18, 2015



ARTHUR SANDERS, ESQ.

BARRON & NEWBURGER, P.C.

Attorneys for defendant

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To:

JONATHAN PAUL CATLIN

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